

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO

IN RE: SARAH D. DONOHUE	)	BANKR. CASE NO. 22--51468
	)	ADV. CASE NO.
	)	
Sarah D. Donohue	)	
168 Robinson Ave.	)	
Barberton, OH 44203	)	
	)	JUDGE ALAN KOSCHIK
	)	
	)	CHAPTER 7
PLAINTIFF	)	
vs.	)	COMPLAINT TO DETERMINE
	)	DISCHARGEABILITY OF STUDENT
	)	LOANS
	)	
U.S. Dept. of Education	)	
400 Maryland Avenue SW	)	
LBJ Education Building 7W311	)	
Washington, DC 20202	)	
	)	
Great Lakes Higher Education	)	
2401 International Lane	)	
Madison, WI 53704	)	
	)	
DEFENDANTS	)	

1. The Plaintiff/Debtor filed this case under Chapter 7 of the Bankruptcy Code on December 13, 2022. This Court thus has jurisdiction over this action under 28 U.S.C. Sec. 1334. This proceeding is a core proceeding under 28 U.S.C. Sec. 157(b)(2)(K). Venue is proper pursuant to 28 U.S.C. Sec. 1409(a).

2. This is an action under U.S.C. Sec. 523 for a determination that excepting Defendant's debts from discharge imposes an undue hardship upon the Plaintiff/Debtor.

3. Defendants are creditors or assignee of creditors of the Plaintiff/Debtor and are holders of unsecured claims in amounts to be determined.

4. Said unsecured debts are claims for student loan obligations that are otherwise excepted from discharge under 11 U.S.C. Sec.

523(a)(8).

5. These debts were incurred to pay tuition expenses for herself to attend Devry University, Concorde Career Institute, and Seminole State College of Florida.

6. The Plaintiff/Debtor has become disabled having being diagnosed with fibromyalgia and is applying for SS disability benefits through the Social Security Administration and is therefore unable to perform any substantial, gainful employment.

7. The Plaintiff/Debtor's income is limited to \$534.00 per month and is derived from food stamps for Plaintiff and 2 minor children. Said income is used to meet her monthly living expenses and she has no resources available to pay the aforementioned student loans, and therefore, any payments on these loans could be made only at great hardship to the Plaintiff/Debtor.

WHEREFORE, the Plaintiff/Debtor prays that this Court enter an Order declaring the student loan debts of the Plaintiff/Debtor to be dischargeable in the bankruptcy case.

/s/ Wayne W. Sarna  
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